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March 4, 2024

VIA ECF

The Honorable Leda Dunn Wettre
United States District Court
Martin Luther King Jr. Federal Building & U.S. Courthouse
50 Walnut Street, Room 3C
Newark, NJ 07102

Re: *United States v. Silviu Catalin Balaci*, Case No. 19-cr-877-CCC

Dear Judge Wettre:

Please accept this letter in lieu of a more formal motion on behalf of defendant Silviu Balaci. Mr. Balaci's current bail conditions, imposed on July 21, 2020, following his guilty plea on July 9, 2020, require, among other things, that he reside in and remain in Germany. Mr. Balaci has fully complied with his bail conditions to date.

We respectfully request, with no objection from the government or Pretrial Services, to modify Mr. Balaci's bail conditions to allow him to travel throughout the European Union. Mr. Balaci will continue to reside in Germany. Before any travel to another EU country, Mr. Balaci will provide advance notice via email to Pretrial Services, detailing his itinerary (including the dates of the planned travel), the purpose of the travel, and any other applicable details.

As noted, neither the government nor Pretrial Services objects to this request. Thank you for the Court's attention to this matter.

Respectfully submitted,
/s/ Robert J. Anello
Robert J. Anello

cc: Assistant United States Attorney Anthony Torntore (via ECF and email)
U.S. Pretrial Services Officer Rhonda LeGrand (via email)